STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, on the Commission's own motion, to consider Ameritech Michigan's compliance with the competitive checklist in Section 271 of the Telecommunications Act of 1996	)))))	Case No. U-11104

AFFIDAVIT OF JOSEPH A. ROGERS
ON BEHALF OF AMERITECH MICHIGAN

STATE OF ILLINOIS)
) ss.
COUNTY OF COOK)

I, Joseph A. Rogers, being first duly sworn upon oath, do hereby depose and state as follows:

Qualifications

1. My name is Joseph A. Rogers. My business address is Ameritech Industry Information Services, 350 N. Orleans, Chicago, Illinois 60606.

2. I am Director - Information Technology for Ameritech Industry Information Services ("AIIS"), a business unit of Ameritech Services, Inc.

3. In my current position, I am responsible for the development, installation and operation of information systems and operations support systems ("OSS") used by AIIS in connection with the provision of unbundled network elements, products and services to Ameritech affiliates and to other requesting carriers and service providers. My responsibilities

include implementation of federal and state telecommunications statutes and regulations as they relate to these systems.

4. I graduated from the University of Illinois at Springfield, Illinois with a B.A. in Computer Science in 1984. I first joined Illinois Bell Telephone Company ("Illinois Bell") in 1974 as a directory assistance operator. After serving in the United States Marine Corps from 1974 to 1978, I returned to Illinois Bell and worked as a central office technician until 1982. In 1982, I became a manager in the Switching Control Center located in Springfield, Illinois, where I was responsible for central office switch translations and central office trouble resolution. In 1984, I was transferred to the Information Technology department for Illinois Bell. My responsibilities were to manage the development, implementation and maintenance of a customer control system for Centrex service. In 1986, I was transferred to Ameritech Services, Inc. to develop the same customer control system for use throughout the Ameritech region. In 1991, I became a Consulting Systems Engineer with Ameritech Services, Inc., responsible for consulting with senior management on the use of Information Technology. I assumed my current position in 1993.

Purpose of Affidavit

5. The purpose of my affidavit is (1) to provide information regarding the operational readiness of the interfaces Ameritech has in operation to meet its obligation to provide non-discriminatory access to its OSS functions, and (2) to respond to certain statements about Ameritech's interfaces made by AT&T witness Timothy M. Connolly.

Operational readiness of the OSS Interfaces

6. As I have outlined on the matrix below, all of Ameritech's OSS interfaces have been tested and are currently in use by telecommunications carriers.

OSS FUNCTION	INTERNAL TESTING	CLEC TESTING	CLEC USE
Pre-ordering	Yes, started 11/95.	USN	USN, CBG
Ordering	Yes. Resale: started 12/95-1/96 UNE: started 2/95	Resale: AT&T, CBG, GE Res Com, USN UNE: CCI, Brooks, MFS	Resale: USN, Network Recovery Systems UNE: CCI, Brooks, MFS
Provisioning	Yes. Resale: started 11/95 UNE: started 2/95	Resale (POC; order completion): AT&T, CBG, GE Res Com, USN UNE: CCI, Brooks, MFS	Resale: USN, Network Recovery Systems UNE: CCI, Brooks, MFS
Maintenance and Repair	Yes.	The interface is the same one currently in use for access service. That interface has been previously tested.	The interface is the same one currently in use for access service.
Billing	Resale: Yes, same as ordering. UNE: Yes.	EMR, AEBS and CABS interfaces have been previously tested.	Resale: AT&T, CBG, GE Res Com, MFS, USN, OneStop, LCI, United Communications UNE: CCI, Brooks, MFS

7. As indicated on the matrix, CLEC testing of the maintenance and repair and billing interfaces is not necessary. The maintenance and repair interface currently is in use, and has been in use for nearly two years, by interexchange carriers in connection with access

service. One of these interexchange carriers, AT&T, currently submits approximately 1000 trouble reports per month over this interface. Using this interface in connection with local exchange service will not involve any change in the way the interface functions. In fact, Ameritech has notified AT&T that the same "dedicated link" to the interface that AT&T already has in place for access service also can be used for local exchange service.

8. Similarly, the billing interfaces currently are in use. Usage data and billing reports are successfully being communicated via the interfaces to the CLECs purchasing resale services and unbundled network elements. Further testing of these interfaces would only confirm what is already evident: the interfaces work.

Response to Mr. Connolly

9. In his affidavit, AT&T witness Timothy M. Connolly suggests that Ameritech has compromised AT&T's ability to use the OSS interfaces by refusing to share its "business rules," i.e., the standards, methods and procedures governing use of the interfaces. This is untrue. Ameritech has provided AT&T with the information it needs to use the interfaces, and has responded to AT&T's questions. Indeed, much of what Mr. Connolly describes as "revisions" to the interface specifications actually have been Ameritech's responses to questions about the interfaces, clarifying existing (unchanged) functions. To support his claim that Ameritech has withheld information, Mr. Connolly provides only two examples. Both lack merit.

10. First, Mr. Connolly states that Ameritech withheld its business rules for 860 transactions (i.e., changes to previously submitted orders) on the EDI interface. (Connolly

Aff., ¶ 56.) Under Ameritech's approach to 860s, only the changes to the order -- rather than the entire order incorporating the changes -- are sent. Mr. Connolly states that Ameritech did not share its business rules on 860 transactions until after AT&T sent its first 860, at which time it was too late for AT&T to make certain "simple design changes." In fact, however, AT&T sent its first 860 in October 1996, two months after Ameritech provided specifications that included a clear example of the proper method of sending 860s over its EDI interface.

11. Second, Mr. Connolly states that Ameritech has not provided sufficient information to reduce manual intervention. (Id., ¶ 64.) This assumes that manual intervention must be reduced. As Mr. Mickens explained in his affidavit, the need for manual intervention depends on the content and complexity of the order being processed. (Mickens Aff., ¶¶ 78, 84.) This is true for all orders, whether the local service provider is Ameritech or a CLEC. Ameritech's obligation under the Act and FCC regulations is not to provide fully electronic processing of all orders, but to provide non-discriminatory access to OSS functions.

12. Mr. Connolly acknowledges in his matrix that Ameritech has provided specifications for every OSS interface for resale services. (Connolly Aff., Exh. 1.) Oddly, however, with respect to some of the interfaces for unbundled network elements, he denies receipt of specifications, even though the interfaces are the same interfaces used for resale or access services. Furthermore, although he acknowledges receipt of most specifications, he qualifies this by asserting that only those for the EMR interface are "final." (Id., ¶ 43.) His position appears to be that specifications must be absolute, with no room for clarifications or changes of any kind, before an interface can be considered operationally ready. This is

illogical. The issue of whether a particular change calls into question the operational readiness of the interfaces depends on the nature of the change, i.e., whether, and how, any core functionalities are affected. Mr. Connolly gives no examples of changes that have impaired operational readiness.

13. Mr. Connolly also suggests that revisions to Ameritech's specifications have interfered with AT&T's efforts to build effective interactive systems. (Id., ¶ 44.) The purpose of these revisions was to facilitate CLECs' use of the interfaces and to comply with the Act and FCC regulations. As I mentioned above, to a large extent, the revisions served to explain, in greater detail, how to use existing functions. The functions were not changed, thus CLECs were not required to re-design their own systems. In some cases, functions were added, primarily in response to regulatory mandates. Again, however, existing functions remained constant. Mr. Connolly makes much of these specification changes, yet he fails to identify any instance in which Ameritech unilaterally changed specifications on which AT&T had relied.

14. Mr. Connolly also states that Ameritech's interfaces are in certain respects out of step with industry standards. (Id., ¶¶ 49-50.) He immediately contradicts himself by stating that "there are no industry standards." (Id., ¶ 51.) In any event, he provides only two examples, and neither is well founded. First, he points to Ameritech's use of EDI Version 5.0 rather then the more recent Version 6.0. He ignores the fact that within the EDI users community, it is common for earlier versions of software (2 to 3 versions back from the newest) to remain in use. There is nothing non-standard about Version 5.0. Ameritech has

invested in enhancements to Version 5.0, and eventually will upgrade to Version 7.0, which is now under development.

15. Second, Mr. Connolly states that Ameritech's specifications for 850 transactions (orders), which require the inclusion of reseller contact information, conflict with industry standards, under which this information is optional. (Id., ¶ 50.) Yet guidelines issued by the Ordering and Billing Forum make this information mandatory. (Attached hereto as Exhibit 1.) Moreover, AT&T itself, in its "Ordering and Provisioning Local Service Request Field Directory", has identified this information as mandatory. (Attached hereto as Exhibit 2.)

Conclusion

16. This concludes my affidavit.

AA0[redacted]CC LSD1 125705-1

I hereby swear, under penalty of perjury, that the foregoing is true and correct, to the best of my knowledge and belief.

Joseph A. Rogers

Subscribed and sworn before me this 14 of January, 1997.

LaVerne M. Bellizio

"OFFICIAL SEAL"
LaVerne M. Bellizio
Notary Public, State of Illinois
My Commission Expires 08/14/99

Notary Public

My Commission expires: _____

3.4 CONTACT SECTION

64. **INIT - Initiator Identification**

Identifies the customer's representative who originated this request.

NOTE 1: This is the person who should be contacted if there are any questions regarding this request. Any authorizations of charges or changes are the responsibility of this person.

USAGE: This field is required.

M	C	D	M	T	R	V	A	S	B
R	R	R	R	R	R	R	R	R	R

DATA CHARACTERISTICS: 15 alpha/numeric characters

EXAMPLE:

J	O	H	N		S	M	I	T	H					

ORDERING AND PROVISIONING

LOCAL SERVICE REQUEST FIELD DIRECTORY

10A. Total Service Resale

10B. Unbundled Network Elements

10.A.77 INIT

Field Name: Initiator Identification

Definition: Identifies the customer's representative who originated this request.

NOTE 1: This is the person who should be contacted if there are any questions regarding this request. Any authorizations of charges or changes are the responsibility of this person.

Cross Reference: LSR Contact Section, Field #62

Characteristics: 15 Alpha/numeric characters

Valid Entries:

Usage Rules: This field is required

Comments:

10.A.78 INPT

Field Name: Interim Number Portability Type

Definition: Identifies the type of Interim Number Portability for this request.

Cross Reference: Loop Service with INP, Service Details Section, Field #25

Characteristics: 1 alpha character

Valid Entries:

Usage Rules: This field is required when the ACT field on the LSR firm is "N"N